

EXHIBIT C



Jessica Mariani <jessica.mariani@lacity.org>

Re: Matthews v. City of LA cv-22-02944-FLA-PD

1 message

William Claiborne <claibornelaw@gmail.com>

Fri, Oct 13, 2023 at 9:04 AM

To: Arlene Hoang <arlene.hoang@lacity.org>

Cc: Evelyn Rodriguez <evelyn.rodriguez@lacity.org>, Jessica Mariani <jessica.mariani@lacity.org>, Jovan Blacknell <jovan@fight4justice.com>

Hi Arlene

I felt like we were too far apart on the stipulation, after reviewing your proposals to ever come up with a negotiated stipulation

As far as the extension goes, extended defendants, every courtesy when it came to extensions Requests

The time you describe our result of propounding the discovery requests wood just a couple of months left in the period

If you can't give me The two week extension extension, then let's discuss this with

Judge Donahue

I'm available every day all day

As far as Mr. Hearn's deposition Goes, we still have to resolve. The issue of Weather defendants are going to provide Mr. Hearn with a copy of the CCW file before his deposition, so this would be a good opportunity to discuss all of the issues with Judge Donahue before the deposition.

Thanks, Chaz

On Fri, Oct 13, 2023 at 8:59 AM Arlene Hoang <arlene.hoang@lacity.org> wrote:

Dear Chaz,

Plaintiffs did not timely request an extension, and therefore all objections have been waived to the discovery requests. Substantive responses only are required to be provided.

While I would under other circumstances absolutely grant your request, Defendants need the responses and documents in advance of deposing Plaintiffs. Two-weeks from today is October 27, which is at the back end of the week that your clients depositions have been noticed for (October 23-25), and would prejudice Defendants.

Although you advised Magistrate Judge Donahue that Plaintiffs would be seeking a continuance of the trial scheduling order, including the discovery cut-off date, and Defendants provided their revisions to the draft stipulation and proposed order thereon over a week ago, no further activity has occurred with regard to the draft stipulation. Thus, we are presently bound by the November 13, 2023 cut-off date.

While Defendants are willing to give Plaintiffs a brief extension (i.e., a couple additional days) to provide substantive responses only (no objections) and the responsive documents, under the present circumstances and the prejudice to Defendants, we cannot agree to a two-week extension.

Arlene Hoang
Deputy City Attorney
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Business and Complex Litigation Division
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Arlene.Hoang@lacity.org

On Fri, Oct 13, 2023 at 8:08 AM William Claiborne <claibornelaw@gmail.com> wrote:

Thanks Arlene

can you give us an extra two weeks to respond?

thanks

Chaz

William Claiborne
Attorney
ClaiborneLaw
[717 D Street, N.W.](#)
[Suite 300](#)
[Washington, DC 20004-2815](#)
202-824-0700

On Fri, Oct 13, 2023 at 7:54 AM Arlene Hoang <arlene.hoang@lacity.org> wrote:

Please see below

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----- Forwarded message -----

From: **Evelyn Rodriguez** <evelyn.rodriguez@lacity.org>
Date: Thu, Sep 7, 2023 at 11:35 AM
Subject: Matthews v. City of LA cv-22-02944-FLA-PD
To: <jovan@fight4justice.com>, William Claiborne <claibornelaw@gmail.com>, Arlene Hoang <arlene.hoang@lacity.org>, Jessica Mariani <jessica.mariani@lacity.org>

Attached please find:

- 1.DEFENDANT'S FIRST SET OF REQUESTS FOR PRODUCTION TO PLAINTIFF JAMAR HEARNS
- 2.DEFENDANT'S FIRST SET OF REQUEST FOR PRODUCTION TO PLAINTIFF DOMINIC ROSS HUNN
- 3.DEFENDANT'S FIRST SET OF REQUEST FOR PRODUCTION TO PLAINTIFF GARRY MATTHEWS

Evelyn Rodriguez
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